



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

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September 22, 2016

Mr. Rob Klee
Commissioner of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

RE: Archaeological, Historic and Sacred Sites on State Property

Dear Commissioner Klee:

A very interesting concern was brought to the Council at recent meetings: the presence of many archaeological, sacred and historic sites on state lands, and the need to protect them from inadvertent harm. These are cultural assets that heighten the value of the parks, forests and wildlife management areas that already have been preserved for the public's use and enjoyment. However, unless the land managers are aware of them, they can be harmed or even destroyed by routine forestry and other land-management activities.

By all accounts, individual DEEP employees take an interest in these assets and have worked diligently to protect them. What is needed is a strategy to formalize and standardize protection efforts so they do not depend on the interest of individuals who inevitably retire or otherwise leave DEEP service. Also, because contractors perform much of the work on state lands, it is important that essential information flows effectively to all parties.

As you know, all state agencies are required by CGS Section 10-387 to

“review, in consultation with the Department of Economic and Community Development, their policies and practices for consistency with the preservation and study of the state's archaeological sites and sacred lands and sites. Such review shall include preparation of an evaluation document which specifies projects and programs requiring detailed consultation to identify and protect archaeological sites and sacred lands and sites.”

Your Department has not prepared the required document. It is hardly alone among agencies in this neglect, but the number of such sites that grace DEEP-managed

lands probably exceeds by far the number in the custody of any other agency. As you know, your Department requires a review of historical and archeological resources to register for the construction stormwater general permit, but the likelihood of encountering those resources is probably greater on state lands, as is the need for a systematic approach to avoiding deleterious impacts on state lands.

The Council recommends that your agency adopt an appropriate policy for identifying and protecting archaeological and sacred sites. Such a policy could build on recent successful instances of DEEP staff working with knowledgeable citizens and contractors.

Using forest management as an example, the essential elements of a formal policy would include:

- Guidance to foresters for including consideration of archaeological and sacred sites in forest management plans. (Those broad, multi-year plans are available now on DEEP's website.)
- Training for identification of sites in the field. (There have been several recent sessions sponsored by nonprofit organizations in which DEEP foresters have participated.)
- Training for best management practices around Native American structures (where physical protection might be paramount) and such things as colonial cellar holes (where adjacent trees probably should be cut).
- Consideration of these resources in development of forest operation plans. These plans, which describe the details of individual anticipated timber harvests, already provide for protection of *known* cultural resources.
- Publication of forest operation plans to allow knowledgeable residents to alert DEEP of potential sites in the area of planned timber harvests.
- A process for using the information provided by citizens.

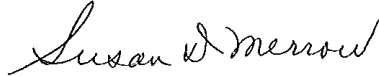
Publication of impending forestry operations is important, as some sites are known only to residents who study archaeological resources. The situation is comparable to the location of rare animal and plant species, which often are known only to birders and other naturalists and thus not recorded in the Natural Diversity Data Base. Unless those citizens know that a land-management project is imminent, they might not perceive a reason to contact DEEP, and the resources will be lost. (There is, of course, a risk that widespread publication of an archeological site's location could attract thieves or vandals, but that is a problem that surely can be solved; in any event, the alternative might be certain destruction.)

Forest management affects more acres than parks management or wildlife management, but the same recommendations apply to those. In fact, certain types of habitat management, such as clearing woodlands to create early-successional habitat, should not proceed without consideration of archaeological resources that might be present.

During discussion of this recommendation, Council members familiar with the educational components of your forestry programs also suggested that the dissemination of information regarding historic and sacred sites could be extended to landowner-oriented publications and training programs for certified forest practitioners.

Thank you for your consideration of this recommendation.

Sincerely,

A handwritten signature in cursive script that reads "Susan D. Merrow".

Susan D. Merrow
Chair